

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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CHARLES M. BUTLER, III and  
CHOLE BUTLER,

Plaintiffs,

v.

UNIFIED LIFE INSURANCE COMPANY,  
HEALTH PLANS INTERMEDIARIES  
HOLDINGS, LLC, D/B/A HEALTH  
INSURANCE INNOVATIONS, HEALTH  
INSURANCE INNOVATIONS, INC.,  
ALLIED NATIONAL, INC., NATIONAL  
BROKERS OF AMERICA, INC., THE  
NATIONAL CONGRESS OF EMPLOYERS,  
INC., and DOES 1-10,

Defendants.

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Cause No. \_\_\_\_\_

**PLAINTIFF'S MOTION TO ENFORCE SUBPOENA**

Plaintiffs, Charles M. Butler III and Chole Butler, by and through undersigned counsel, hereby move for an order compelling Defendant National Brokers of America, Inc. to respond to Plaintiffs' subpoena to produce documents in compliance with Federal Rule of Civil Procedure 45. In support of this Motion, Plaintiffs hereby incorporate by reference, as if fully set forth herein, the accompanying memorandum of law and exhibits. A proposed form of order is also included.

Respectfully submitted,

/s/ Benjamin E. Gordon

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Dated: January 7, 2019